



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

October 16, 2019

Mr. Jeff Ballard
President and CEO
Texas GulfLink, LLC
8333 Douglas Ave, Ste 400
Dallas, TX 75225

RE: Clean Air Act (CAA) Permit Applications for Texas GulfLink, LLC (GulfLink) Deepwater Port (DWP) Project

Dear Mr. Ballard:

The United States Environmental Protection Agency (EPA) previously outlined in our letter dated August 2, 2019, how your CAA permit applications were incomplete. In that letter, we provided our request for specific information needed to find your applications complete and issue a CAA Title V permit and a Prevention of Significant Deterioration (PSD) permit for the proposed offshore portion of your DWP. The information requested is required in order for EPA to develop a Statement of Basis and rationale for the terms and conditions for the proposed CAA permits for the DWP.

Texas GulfLink responded only partially to our request, by letter dated August 28, 2019. Although you clarified some matters in your partial response, you indicated that you would be providing the rest of the requested information at a future date. For the Title V permit application, you stated that you would submit a complete application "at an appropriate time after finalizing the PSD permit application." With regard to air quality modeling (to supplement the PSD permit application), updated information was discussed in a teleconference held between your modeling group and our air modeler on August 27, 2019, but this information has not been provided to us in writing.

Given the fact that we have not received the information requested, we thank you for participating in a brief teleconference on October 15, 2019. During our call, we explained that the CAA permitting process is based upon your actual and full design information as formally submitted in permit applications and cannot proceed until such applications are complete. Additionally, we discussed the fact that neither of the CAA applications had the required signatures.

We now understand that GulfLink is not prepared to submit signed and complete CAA permit applications containing full design information at this time, since you are still exploring the applicability of 40 CFR Part 63 Subpart Y for your DWP project. As we explained in our call on October 15, 2019, EPA can no longer consider your unsigned Title V and PSD applications active, and we have ceased work until you submit signed and complete CAA permit applications.

If you have questions on submitting complete Title V and PSD permit applications for your DWP project, please refer back to our letter dated August 2, 2019, and feel free to contact either Brad Toups of my staff at (214) 665-7258, or myself at (214) 665-6772. Thank you for your attention to this matter.

Sincerely,

10/16/2019

X Cynthia J. Kaleri

Cynthia J. Kaleri

Air Permits Section Chief

Signed by: Environmental Protection Agency